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*Attorneys for Defendants American Media, Inc.  
and Distribution Services, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANDERSON NEWS, L.L.C. and LLOYD WHITAKER,  
as the Assignee under an Assignment for the Benefit of  
Creditors for Anderson Services, L.L.C.,

Plaintiffs,

- against -

AMERICAN MEDIA, INC., BAUER PUBLISHING  
CO., L.P., CURTIS CIRCULATION COMPANY,  
DISTRIBUTION SERVICES, INC., HACHETTE  
FILIPACCHI MEDIA U.S., INC., HEARST  
COMMUNICATIONS, INC., HUDSON NEWS  
DISTRIBUTORS LLC, KABLE DISTRIBUTION  
SERVICES, INC., RODALE, INC., TIME INC., and  
TIME/WARNER RETAIL SALES & MARKETING,  
INC.,

Defendants.

No. 09 Civ. 2227 (PAC)

**DECLARATION OF JAY D. DEALY  
IN FURTHER SUPPORT OF  
DEFENDANTS' JOINT MOTION TO  
EXCLUDE CERTAIN  
TESTIMONY OF  
DR. LESLIE M. MARX**

AMERICAN MEDIA, INC., HEARST  
COMMUNICATIONS, INC., and TIME INC.,

Counterclaim-Plaintiffs,

- against -

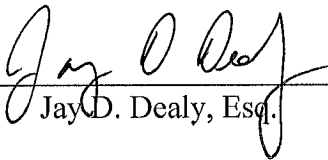
ANDERSON NEWS, L.L.C. and CHARLES  
ANDERSON, JR.,

Counterclaim-Defendants.

1. I am a member in good standing of the Bar of the State of New York and an attorney at the law firm of Pillsbury Winthrop Shaw Pittman LLP, with its offices located at 1540 Broadway, New York, New York 10036. I am familiar with the subject matter of this action and have personal knowledge of the facts set forth herein. I submit this declaration on behalf of Defendants.

2. Attached as Exhibit 1 is a true and correct copy of a document produced by Defendants American Media Inc, and Distribution Services, Inc., Bates stamped AMIDSI00002779.

3. I declare under penalty of perjury that the foregoing is true and correct. Executed on April 17, 2015.

  
Jay D. Dealy, Esq.